

# ***EXHIBIT 15***

**From:** [Keisha Hall](#)  
**To:** [Ann Cosimano](#)  
**Subject:** RE: ARAG Case No: 3795775  
**Date:** Tuesday, January 7, 2025 4:12:12 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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Pardon the confusion, yes we are.

Best regards,



Keisha K. Hall, Esq.  
Attorney-at-Law  
200 South Andrews Avenue, Ste. 504  
Fort Lauderdale, FL 33301  
PH.: 954-361-2759 Fax: 954-372-2144  
[khall@allpointslegal.com](mailto:khall@allpointslegal.com) [www.allpointslegal.com](http://www.allpointslegal.com)

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**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>  
**Sent:** Tuesday, January 7, 2025 6:07 PM  
**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>  
**Subject:** RE: ARAG Case No: 3795775

I'm sorry, I had a note from you on November 25<sup>th</sup> indicating I should hold off. If you are ready, I can get this sent out to you.

Thank you,  
Ann

---

**From:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>  
**Sent:** Tuesday, January 7, 2025 3:53 PM  
**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>  
**Subject:** RE: ARAG Case No: 3795775

Good day and Happy New Year Ms. Cosimano:

I hope you are well. Please advise as to the status of the Retainer fee.

Best regards,



Keisha K. Hall, Esq.  
Attorney-at-Law  
200 South Andrews Avenue, Ste. 504  
Fort Lauderdale, FL 33301  
PH.: 954-361-2759 Fax: 954-372-2144  
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**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>  
**Sent:** Thursday, December 5, 2024 12:34 PM  
**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>  
**Subject:** RE: ARAG Case No: 3795775

That is good news. I see her in our system. Looks good.

---

**From:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>  
**Sent:** Wednesday, December 4, 2024 6:35 PM  
**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>  
**Subject:** RE: ARAG Case No: 3795775

Hello Ann,

Great news, Ms. Farr is a part of the ARAG network, Attorney ID: 772550589180.

Best regards,



Keisha K. Hall, Esq.  
Attorney-at-Law  
200 South Andrews Avenue, Ste. 504  
Fort Lauderdale, FL 33301  
PH.: 954-361-2759 Fax: 954-372-2144  
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---

**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Sent:** Wednesday, December 4, 2024 12:53 PM

**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Keisha,

Yes, feel free to forward the information to Ms. Farr and see if she'd like to join the network.

Ann

---

**From:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Sent:** Wednesday, December 4, 2024 11:33 AM

**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Good day Ann:

I will forward this to her. Ms. Farr's rate is also 350 per hour, before I forward let me know if that would be an issue.

You are correct, I would only be handling the State Court case, apparently, there was discovery taken in the federal case that directly impacts the State Court and which would need to be reviewed. There would be no duplication.

Best regards,



Keisha K. Hall, Esq.  
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---

**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Sent:** Wednesday, December 4, 2024 12:28 PM

**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Keisha,

I've been considering your request. Our policy provides coverage for members to use a Network Attorney paid by us or a non-network attorney under an indemnity schedule. If Attorney Farr is willing to apply to become a member of the network and is approved, if their rate is lower than yours and the work would not be duplicative and your intention would be to have them assist with discovery related issues if they are more than one person can handle, I can see the logic in that arrangement.

Also, I was thinking about your statement below about discovery and want to be clear this is for the state court action where Will McNae would be your client?

Let me know your thoughts,

Ann

---

**From:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Sent:** Wednesday, November 27, 2024 9:52 AM

**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Good day Ann:

I would send the bills to you as well, so my bill would show Attorney Bryan Farr's bill as well. I would also provide the detail of each activity. Attorney Bryan Farr would be my co-counsel so I would send over the payment once received from ARAG.

Mr. McNae and prior counsel have both indicated that there has already been a lot of discovery, so it is not as I first expected. I apologize for the update.

Kindly advise.

Best regards,

Keisha K. Hall, Esq.  
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Fort Lauderdale, FL 33301  
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---

**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Sent:** Tuesday, November 26, 2024 5:49 PM

**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Keisha,

Thanks for the message. Do you have an idea of how the arrangement would work? Have a someone in mind?

Ann

---

**From:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Sent:** Tuesday, November 26, 2024 2:08 PM

**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Good day Ann:

Perchance would ARAG allow me to work with a co-counsel on this matter? I am a sole-practitioner and will also be an Adjunct next year, so I want to be sure I will have the bandwidth to properly handle the matter.

Best regards,



Keisha K. Hall, Esq.  
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**From:** Keisha Hall  
**Sent:** Monday, November 25, 2024 3:14 PM  
**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>  
**Subject:** RE: ARAG Case No: 3795775

Hello Ann,

Please hold off on sending the retainer funds. I need to do a full review of this case before I can proceed fully.

Best regards,



Keisha K. Hall, Esq.  
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[khall@allpointslegal.com](mailto:khall@allpointslegal.com) [www.allpointslegal.com](http://www.allpointslegal.com)

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---

**From:** Keisha Hall  
**Sent:** Friday, November 22, 2024 12:35 PM  
**To:** 'Ann Cosimano' <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>  
**Subject:** RE: ARAG Case No: 3795775

Hello Ann,

I have sent the Trust Request via CLIO ( APL's Billing and CRM System). Typically, ARAG pays APL via ACH directly to my operating account. Although the Initial Retainer is non-refundable, I still route it through my Trust account (old-school and I err on the side of caution).

I am attaching APL's wire and ach instructions for the Trust account. If it is easier to route through the Operating I will simply transfer to the Trust.

Mr. McNae understands that he is responsible for the costs and has advised that I will receive over 1000 pages of transcripts alone!

Best regards,



Keisha K. Hall, Esq.  
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---

**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Sent:** Friday, November 22, 2024 12:15 PM

**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Keisha,

Attached find the fully executed amendment. As I indicated on our call, you can forward your bills directly to me and I will prioritize their payment. Let me know if you have any questions.

Ann

---

**From:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Sent:** Friday, November 22, 2024 11:06 AM

**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Hello Ann,



I added the portion about the retainer to the Amendment and then executed. I am still attaching a Word version with track changes (112024) in case you need to make further edits.

Best regards,



Keisha K. Hall, Esq.  
Attorney-at-Law  
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---

**From:** Keisha Hall  
**Sent:** Friday, November 22, 2024 11:40 AM  
**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>  
**Subject:** RE: ARAG Case No: 3795775

Hello Ann,

I am actually on the phone with him now. I will have him sign the retainer and will then send you the Trust Request.

Best regards,



Keisha K. Hall, Esq.  
Attorney-at-Law  
200 South Andrews Avenue, Ste. 504  
Fort Lauderdale, FL 33301  
PH.: 954-361-2759 Fax: 954-372-2144  
[khall@allpointslegal.com](mailto:khall@allpointslegal.com) [www.allpointslegal.com](http://www.allpointslegal.com)

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**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Sent:** Friday, November 22, 2024 11:16 AM

**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Good morning, Ms. Hall. Did you have any questions about the amendment? Once returned, I can process your retainer.

Let me know how I can help.

Ann

---

**From:** Ann Cosimano

**Sent:** Wednesday, November 20, 2024 3:49 PM

**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Ms. Hall,

Attached please find the amendment for your review.

Let me know if you have any questions.

Ann

---

**From:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Sent:** Wednesday, November 20, 2024 3:34 PM

**To:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Subject:** RE: ARAG Case No: 3795775

Good day Ms. Cosimano:

Yes, please send over the amendment to the Agreement.

Best regards,



Keisha K. Hall, Esq.  
Attorney-at-Law  
200 South Andrews Avenue, Ste. 504  
Fort Lauderdale, FL 33301  
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---

**From:** Ann Cosimano <[Ann.Cosimano@ARAGlegal.com](mailto:Ann.Cosimano@ARAGlegal.com)>

**Sent:** Wednesday, November 20, 2024 2:44 PM

**To:** Keisha Hall <[khall@allpointslegal.com](mailto:khall@allpointslegal.com)>

**Subject:** ARAG Case No: 3795775

Dear Ms. Hall,

Thank you for taking the time to speak with me today. I confirmed ARAG is willing to pay a \$5,000 retainer. Let me know if you'd like me to send over the amendment to your Network Attorney Agreement.

Ann



**Ann Cosimano | She/Her**

*General Counsel*

**ARAG Legal Insurance**

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